REMARKS

In the Office Action mailed December 12, 2002, Claims 1-18 were pending. After entry of this amendment, Claims 1-35 are pending. The office action summary indicates that Claims 1-18 are rejected. Specifically, Claims 4-5 were rejected under 35 U.S.C. §112, and Claims 1-18 were rejected under 35 U.S.C. §103(a). Additionally, the Examiner notes that there were no line numbers in the claims and requests that future correspondences include line numbering. Applicants have added claim line numbering.

Applicants respectfully traverse the rejections by submitting amending the claims to further distinguish or clarify the differences with respect of the cited prior art references. Applicants respectfully submit that the claims as amended recite limitations that are not taught or suggested by the references.

Each objection or rejection is now addressed in further detail.

35 U.S.C. §112 Rejection

The Examiner has rejected Claims 4-5 under 35 U.S.C. §112. The Examiner suggests that Claims 4-5 contain subject matter which was not described in the specification in such a way as to enable one skilled in the art to which it pertains, or with which it is most nearly connected, to make and/or use the invention. Claim 4-5 have been amended to remove the term "external network" and insert the term "second communication link". Applicants trusts that with this amendment the 35 U.S.C. §112 rejection will be withdrawn.

35 U.S.C. §103 Rejection

The Examiner has rejected Claims 1-18 under 35 U.S.C. §103(a) as being unpatentable over Van Ee U.S. Patent No. 6,466,203 (hereinafter "Ee") in view of Smith, U.S. Patent No. 5,974,085 (hereinafter "Smith").

Ee is generally directed to and describes a mobile phone having a display with a touch screen and a browser that is capable of retrieving a Web page from the Internet (Abstract, lines 1-3). An auto-zoom feature permits a user of the device to browse the web using a display of limited size (Abstract, lines 8-9).

Smith is generally directed to a wireless modem and method for routing data to an application or to storage. An application registry is programmed into a wireless modem and includes routing information for routing data, based upon data type, to an application or to storage. Thereafter, the wireless modem receives the data and determines the data type. The wireless modem then routes the data in accordance with the routing information for the data type and, when the routing information indicates the application is located in an external device, further in accordance with an accessibility status of the external device. (See Abstract)

Claim 1

Claim 1 is an independent claim and has been amended herein. Applicant has taken the amendments made into account in responding to the Examiner's rejection.

Applicants note that three criteria must be met to establish a *prima facie* case of obviousness under 35 U.S.C. §103(a). First, there must be some suggestion or motivation,

either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. (See M.P.E.P. §2142). Applicant addresses these criteria as applied to the claims below.

As a general proposition, applicants respectfully submit that the cited art of Ee in view of Smith fails to disclose or suggest all of the claim limitations and that Claim 1 as amended is novel and not obvious in light of the cited prior art and therefore patentably distinct from it. In addition there is no suggestion or motivation to modify the references in a way that would provide applicant's invention as claimed, or any reasonable expectation that if such references were combined such combination would lead to the invention with any degree of success.

Claim 1 recites "*a client module embedded in the handheld device to enable the handheld device to send a selected stored Universal Resource Locator (URL) via a local communication link, wherein the URL indicates a desired Internet web page*".

The Examiner suggests that Ee teaches (quoting the examiner) "a client module embedded in the handheld device to enable the handheld device to send a URL via a communication link, wherein the URL indicates a desired web page" (Examiner cites col. 1, lines 21-26, 53-59, and col. 3, line 67 to col. 4, line 1).

Applicant has reviewed the cited portion of Ee and does not find any such specific teaching or suggestion. Col. 1, lines 21-26 state (taking the complete sentence contained therein): "*For example, handheld information processing devices with Internet access (browsers) and displays, such as PDA's, palmtops, web pads, mobile phones using, e.g., the*

WAP (wireless application protocol) technology, etc., can be given browsers for retrieving and navigating web pages from the Internet, but they cannot render a page in its entirety without losing information."

Col. 1, lines 53-59 states (taking the complete sentence contained therein): *"The invention is especially interesting to handhelds, such as PDA's, palmtops, mobile phones, web pads (thin clients with browsing capabilities), etc., because the size of a handheld's display is necessarily small due to the required form factor and weight limitation. The ubiquitous information access via a browser is a great asset for Internet-enabled handhelds (comprising a wireless modem), as not only text pages but also, e.g., still pictures (e.g., jpeg), streaming video, web page with hyperlinks (e.g., HTML) and java animation are now within reach of these devices whose screen real estate needs not be the limiting factor anymore."*

Col. 3, line 67 to Col. 4 line 1 states (taking the complete sentence contained therein): "*Program memory 110 stores, among other things, a browser application for enabling the user to navigate the Web, and the software for processing the graphical data as explained herein."*

Based on the cited passages in Ee, it appears that the Examiner is equating a device "web browser" of Ee with the claimed "client module", and a "wireless Internet connection" of Ee as the claimed "communication link". Furthermore, nowhere is found in these cited passages a direct statement that "*the handheld device sends a URL via a communication link*" as claimed, in fact neither the term "URL" nor the phrase "Universal Reference Locator" appear to be used in Ee.

Applicant respectfully submits that one of the features of the invention is that it provides "mobile Internet access function for handheld devices while not requiring the

hand-held devices to be internet-enabled" (See specification at page 4, lines 5-7) and that the "client device 11 does not need a web browser (See specification at page 8, line 7). It will be noted that this does not preclude the device from having an Internet browser or Internet connection as explained in the specification, just that they are not needed to provide this functionality and operation.

Applicant has amended Claim 1 to clarify the differences between a local communication link that supports communication of the URL to the receiver, and an Internet communication link different from the local communication link to access and retrieve the desired web page as follows with emphasis by underlining added: *"A system for providing Internet-related services in response to a handheld device without requiring the handheld device to itself be Internet-enabled, comprising: a client module embedded in the handheld device to enable the handheld device to send a selected stored Universal Resource Locator (URL) via a local communication link, wherein the URL indicates a desired Internet web page; a receiver that receives the URL sent from the handheld device via the local communication link; a web access module coupled to the receiver and to an external Internet via an Internet communication link different from said local communication link to access and retrieve the desired web page from a remote web server via the external Internet; and a render system coupled to the web access module to render the retrieved web page to the user of the handheld device.*

In contrast to the claimed invention, Ee merely discloses a mobile phone having a display with a touch screen, and that the user can browse the Web with a mobile phone display using a zoom feature to enhance the visibility of portions of the web pages retrieved. A wireless modem for the Internet communications link is required. (Note Ee Abstract.) Applicants submit that Ee does not disclose or suggest a client module as claimed and set forth above.

Claim 1 further recites "*a receiver that receives the URL sent from the handheld device via the local communication link*". Applicant does not see any separate citation or statement that either Ee or Smith disclose, teach, suggest, or motivate any need for this element. Ee discloses a handheld device including a display and an Internet browser for retrieving and navigating web pages from the Internet. (Ee, col. 2 lines 21-26). Applicants submit that Ee does not disclose or suggest a receiver as recited in Claim 1.

Claim 1 further recites "a web access module coupled to the receiver and to an external Internet via an Internet communication link different from said local communication link to access and retrieve the desired web page from a remote web server via the external Internet". The examiner suggests that Ee teaches "a web access module coupled to external Internet to access and retrieve the desired web page from a remote web server via the external Internet (citing Col. 3 lines 65-66, and col. 4 lines 4-5). Applicant respectfully disagrees.

Applicant observes, at col. 3, lines 65-66 that Ee states: "*Handheld 100 comprises a wireless modem 114 for connecting to Internet 116.*" Col. 4, lines 4-5 state: "*When the user has retrieved a web page via modem 114 the page gets displayed on LCD 102 in its entirety.*" While Applicant does not see the commonality, apparently the examiner is equating the Ee "modem" to the claimed "web access module". Applicants claimed web access module is not the same as the Ee modem.

Ee discloses that a memory of the handheld device may store the browser, and that a user may retrieve a web page via modem to display the page on the necessarily small LCD of the handheld. (Ee, col. 2 lines 53-54, Ee, col. 3 line 66 to col. 4 line 5). Ee further discloses a wireless modem as part of the handheld device. (Ee, col. 3 lines 65-66, col. 4 lines 4-5). Applicants respectfully submit that Ee does not disclose or suggest a web access module to

access and retrieve the Internet-related service via the Internet communication link based on the URL.

Additionally, Claim 1 (after amendment) recites "a render system coupled to the web access module to render the retrieved web page".

The Examiner suggests that Ee teaches "a render system to render the retrieved web page to the user of the handheld device", and cites col. 2, lines 39-41, and col. 4, lines 4-5 to support this suggested teaching. As Applicant observes, col. 2, lines 39-41 of Ee state: *"The system processes the data upon receipt and renders on the display an image corresponding to the data received."*; and col. 4, lines 4-5 state: *"When the user has retrieved a web page via modem 114 the page gets displayed on LCD 102 in its entirety"*.

Applicant first notes that Claim 1 does not require that the web page be rendered on the handheld device. For some embodiments the rendering may occur on the handheld device, but other embodiments of the invention provide for rendering on a device physically separate from the handheld device. Ee discloses a handheld device including a display and an Internet browser for retrieving and navigating web pages from the Internet. (Ee, col. 2 lines 21-26). Applicants submit that Ee does not disclose or suggest a render module independent of the handheld device. In contrast, Ee requires that the page is displayed on the LCD of the handheld device (Ee, col. 4, lines 4-6). Applicants submit that Ee does not disclose or suggest a render module to render the retrieved Internet-related service.

The Examiner ultimately concedes that Ee did not specifically teach 'that a receiver that receives the URL sent from the handheld device via the communication link, the web access module is coupled to the receiver and the render system is coupled to the web access module'.

The Examiner however suggests that Smith teaches (1) 'a wireless modem to include a receiver that receives the URL sent from the handheld device via the communication link' (citation to col. 1, lines 60-63, and col. 3, lines 34-43); (2) 'a web access module coupled to the receiver and external Internet to access and retrieve the desired web page from a remote web server via the external Internet' (citation to col. 1, line 59 to col. 2 line 5, 41-46; and col. 3, lines 8-18); and (3) 'a render system coupled to the web access module to render the retrieved web page to the user of the handheld device' (citation to col. 3, lines 44-50).

Applicant respectfully takes exception to the interpretation of the citations to Smith and suggests that the Examiner has applied impermissible hindsight using knowledge of the claimed subject matter to read into Smith what is not actually present. For example, col. 1, lines 60-63, and col. 3, lines 34-43 state: "*Another aspect of the present invention is a wireless modem for routing data to an application. The wireless modem comprises a receiver for receiving the data, and a processing system coupled to the receiver for processing the data.*"; and "*FIG. 2 is an electrical block diagram of an exemplary wireless modem 124 in accordance with the present invention, coupled to the at least one external device 126 and to an external storage element 236. The wireless modem 124 comprises an antenna 204 for intercepting an outbound message and (optionally) for transmitting an inbound message to a base receiver (not shown). The antenna 204 is coupled to a conventional receiver 208 for receiving the outbound message and, optionally, is coupled to a conventional transmitter 209 for transmitting the inbound message.*"

Noteably, neither of these cited passages from Smith mention URL or Universal Reference Locator. Perhaps even more significantly, Applicant has not been able to find even a single reference to or use of either the term "URL" or the equivalent phrase "Universal Reference Locator" anywhere within Smith or Ee. Therefore it is unclear as to the basis that

either reference alone or the combination of the two references could teach anything about sending or receiving a URL.

Smith merely talks about "data" it does not talk about URL's, and therefore while it may teach some type of wireless modem communication having a receiver component, there is no disclosure, teaching, or suggestion that the data should be a URL.

With reference to the citation to col. 1, line 59 to col. 2 line 5, 41-46; and col. 3, lines 8-18, Applicant notes that col. 1, line 59 - col. 2 line 5, states: "*Another aspect of the present invention is a wireless modem for routing data to an application. The wireless modem comprises a receiver for receiving the data, and a processing system coupled to the receiver for processing the data. The processing system comprises a memory for storing an application registry including routing information for routing the data, based upon data type, to the application or to storage in the memory. The wireless modem also includes an external device interface coupled to the processing system for interfacing with an external device. The processing system is arranged to program the application registry with the routing information, and thereafter, to receive the data and determine the data type.*"

Furthermore, col. 2 lines 41-46 of Smith state: "*In addition to the portable subscriber units 122, the base stations 116 communicate with wireless modems 124 in accordance with the present invention. The wireless modems 124 are preferably coupled to at least one external device 126, such as a conventional personal computer (PC) or personal digital assistant (PDA).*".

Applicant submits that while Smith may arguably teach a wireless modem connected to an external device (see for example FIG. 1, showing external device 126 connected to wireless modem 124 which in turn is in wireless communication with base station 116 via

antenna 118), it does not teach or suggest "a web access module coupled to the receiver and to an external Internet via an Internet communication link different from said local communication link to access and retrieve the desired web page from a remote web server via the external Internet".

Smith at col. 3, lines 8-18 states: "*The controller 112 preferably is coupled by telephone links 101 to a public switched telephone network (PSTN) 110 for receiving selective call message originations therefrom. Selective call originations comprising voice and data messages from the PSTN 110 can be generated, for example, from a conventional telephone 111 or a conventional computer 113 coupled to the PSTN 110. It will be appreciated that, alternatively, other types of communication networks, e.g., packet switched networks, the Internet, and local area networks, can be utilized as well for transporting originated messages to the controller 112*".

While this section of Smith may teach that the communication network that Smith couples to may be the Internet, Smith merely mentions this as a possibility that may be utilized "for transporting originated messages to the controller". This may arguably provide a basis for the controller of Smith retrieving a web page from a remote server, but the referenced section does not mention communicating a URL or otherwise provide any teaching relative to other aspects of Applicants Claim 1 as elaborated more specifically above and below. This teaching appears to relate to the data routing aspect of Smith. Smith requires a wireless modem receives the data and determine the data type and then route the data according to the data type. (Note, Smith Abstract.) Smith discloses that the wireless modem receives the data, determines the data type, and then routes the data according to the data type. Applicants fail to see any particular relevance of this suggested teaching to claim 1 or to claims dependent there from.

The Examiner suggests that it would have been obvious to a person of ordinary skill in the art at the time the present invention was made to combine the teachings of Ee and Smith and add or replace the built-in wireless modem in Ee's handheld device with Smith's wireless modem where Smith's wireless modem can be connected to different handheld devices. Applicants respectfully disagree.

The reason or motivation for one skilled in the art to combine the teachings of Ee and Smith are unclear. Ee teaches a mobile telephone having a small display screen with touch sensitive auto-zoom feature, and a built-in wireless modem and web browser for connecting with the Internet.

The Examiner is apparently suggesting that there would be a perceived advantage to substituting or adding as a second modem the wireless modem of Smith, the examiner further suggesting that the modem of Smith "can be connected to different handheld devices". Applicant can find no teaching in Smith teaching or suggesting that different modems are connected to different external devices or that the same modem is connected to different external devices in any manner that that available for other modems. If there is such a teaching, Applicant requests the Examiner identify a particular passage or passages in Smith providing such teaching. As there is no apparent difference in the modem of Ee and the modem of Smith, Applicant fails to see any motivation to substitute the modems as suggested by the examiner.

Furthermore, as Smith only of necessity provides for outbound messages (messages from the base station to the external device) and does not of necessity provide inbound messages (messages from the external device to the base station receiver), and as the claimed invention requires that the URL be sent from the external device to the receiver, the

combination of Ee and Smith in its basic form would simply not work to provide the Internet services.

Applicants submit that the cited art fails to disclose or suggest a client module sending a URL to a receiver, the receiver receiving the URL and a web access module that accesses the web site at the URL, and a render system rendering it. Ee requires a handheld device (a cell phone) communicating through a wireless modem over an Internet communication link and utilizing a web browser for accessing the Internet. (Note Ee Abstract, col. 3 lines 65-66.) The fundamental premise of Ee is to identify the web site using the touch screen of a mobile telephone, access the web site directly from mobile telephone using its radio-frequency modem capability, and render the accessed web content on the small mobile telephone screen with the aid of the touch screen auto-zoom feature. Nowhere in Ee is there any suggestion of a need or desirability to utilize a different device for rendering the accessed web site content, in fact Ee teaches away from any suggestion of such need as the intent is to provide both full-page (at reduced resolution) and full-resolution (for a partial page) using the mobile telephone. A reference which leads one away from the claimed invention cannot render the invention obvious. See Dow Chemical v. American Cyanamid, 2 USPQ 2d 1350 (Fed. Cir. 1987).

Smith is directed to a wireless modem and method for routing data to an application or to storage using the modem. When an external device and wireless modem are involved the only required direction of transmission is from the base station 116 to the external device 126, that is what is referred to as an outbound message. Messages that would be "inbound" messages are optional. Applicant does not identify the claimed URL with any message of Smith, but the URL would be an inbound message to the receiver and web access module. In embodiments of Applicants invention in which the rendering is accomplished on other than

the handheld device, there would be no outbound message to the handheld device. This required character of the outbound message and the optional character of the inbound message is made clear at col. 3, lines 36-40 of Smith which states: "*The wireless modem 124 comprises an antenna 204 for intercepting an outbound message and (optionally) for transmitting an inbound message to a base receiver (not shown).*" *(emphasis added by underlining)*. FIG. 2 of Smith also shows all of the wireless communications going from the base station 116 to (transmit) antennas 118 for wireless transmission to the other units. None of the directional arrows show transmission of a signal to the base station, and even more particularly none show transmission of a URL to the base station.

Applicants submit that Ee and Smith do not disclose or suggest the limitations recited in Claim 1 and fail to establish a *prima facie* case of obviousness under 35 U.S.C. §103(a). For at least these reasons, Applicants submit that independent Claim 1 is distinguished from and allowable over the disclosure of Ee and Smith.

Dependent Claims 2-12

Claim 2 is dependent on independent Claim 1. Claim 2 is allowable for at least the same reasons as independent Claim 1, and further because the dependent claim adds the additional feature and limitation "wherein the handheld device fits into a user's palm". For at least these reasons, Applicants submit that dependent Claim 2 is distinguished from and allowable over the disclosure of Ee and Smith.

Claim 3 is dependent on independent Claim 1. Claim 3 is allowable for at least the same reasons as independent Claim 1, and further because the dependent claim adds the additional feature and limitation of "further comprising a memory coupled with the handheld

device to store at least one URL, wherein the URL sent is selected from the at least one URL". For at least these reasons, Applicants submit that dependent Claim 3 is distinguished from and allowable over the disclosure of Ee and Smith. Applicant submits that neither Ee nor Smith mention URL, or sending, receiving, or storing a URL in a memory. The examiner suggests that Ee teaches a memory that stores the URL (citation to col.3, lines 55-59) but this suggested teaching merely teaches that a portion of memory is allocated as a frame buffer that stores the content of the displayed content in bit map form. It does not teach or suggest storing the URL.

It will be further appreciated in the context of this claim that in one embodiment of the invention described, for example, at page 7, lines 15-17 of the specification, the handheld device "stores Universal Resource Locators (URLs) for information and/or services the user of the client device 11 commonly or frequently accesses". This is one reason why embodiments of the invention do not require an Internet browser – the URLs are already identified to the user of the device and that user merely selects the one corresponding to the desired web page or content and sends it to the receiver to initiate retrieval and rendering.

Claim 4 is dependent on independent Claim 1. Claim 4 is allowable for at least the same reasons as independent Claim 1, and further because the dependent claim adds the additional feature and limitation "further comprising a communication module in the handheld device that receives the URL from a remote site via a second communication link coupled to the communication module". Again, Ee and Smith are both silent relative to communicating a URL. For at least these reasons, Applicants submit that dependent Claim 4 is distinguished from and allowable over the disclosure of Ee and Smith.

Claim 5 is dependent on dependent Claim 4. Claim 5 is allowable for at least the same reasons as dependent Claim 4 (and Claim 1), and further because it adds the additional

feature and limitation "wherein the second communication link is a link to a wireless network". It should be appreciated that this feature provides an alternative mechanism (and different from an Internet connection or Internet browser based interface) for providing the handheld device with URLs, which can then be stored and sent upon receipt or at a later time. For at least these reasons, Applicants submit that dependent Claim 5 is distinguished from and allowable over the disclosure of Ee and Smith.

Claim 6 is dependent on independent Claim 1. Claim 6 is allowable for at least the same reasons as independent Claim 1, and further because the dependent claim adds the additional feature and limitation "wherein the handheld device is selected from a group of devices consisting of: a pager device, a cellular phone device, a personal organizer device, a watch device, a palm pilot device, and an information appliance device". Applicant notes with particularity that neither Ee nor Smith teach or suggest a pager or a watch as the handheld device. Such small devices were likely not considered because Ee has the need for a browser application, sufficient memory to store incoming content and at least the browser application, an internal display, and processing power to render the content for the display. Smith would not see either a pager or a watch as a suitable destination for the data it distributes. The pager and watch are just physically too small and have too low performance for conventional Internet access or data storage applications, but work fine with the invention as it is only required to store and ultimately transmit the few bits associated with a URL, not the megabytes required to receive web page content and store Internet browser applications programs. For at least these reasons, Applicants submit that dependent Claim 6 is distinguished from and allowable over the disclosure of Ee and Smith.

Claim 7 is dependent on independent Claim 1. Claim 7 is allowable for at least the same reasons as independent Claim 1, and further because the it adds the additional feature

and limitation "wherein the receiver, the web access module, and the render system all physically reside within a single enclosure separate from the handheld device". The examiner suggests that Smith teaches (Fig. 2) a single enclosure separate from the handheld device for physically enclosing the receiver, the web access module, and the render system. Applicant does not agree that Smith teaches these elements, however, even were it to teach such elements under the Examiner's interpretation, Applicant cannot find a basis in FIG. 2 for such single physical enclosure.

The brief description of the drawings section states that "FIG. 2 is an electrical block diagram of an exemplary wireless modem in accordance with the present invention coupled to an external device and an external storage element." At most it may identify some electrical relationships amongst the modem components, and makes no statement relative to there being a single physical connection or enclosure. The dashed line "124" identifies "modem 124", the dashed line "206" identifies "a processing system 206 for processing the outbound messages and for controlling the wireless modem 124 in accordance with the present invention". While the user interface 214 is shown within the confines of the electrical block diagram" again there is no teaching or suggestion that the "conventional display 216 for displaying the messages" would be physically with a modem! In fact placing a conventional display, such as a conventional 17" CRT based display or even a smaller LCD display, would be completely contrary to conventional practice. FIG. 2 of Smith simply cannot be relied upon as a teaching suggesting Applicants Claim 7 features. For at least these reasons, Applicants submit that dependent Claim 7 is distinguished from and allowable over the disclosure of Ee and Smith.

Claim 8 is dependent on independent Claim 1. Claim 8 is allowable for at least the same reasons as independent Claim 1, and further because the dependent claim adds the

additional feature and limitation "wherein the communication link is a wireless communication link". For at least these reasons, Applicants submit that dependent Claim 8 is distinguished from and allowable over the disclosure of Ee and Smith.

Claim 9 is dependent on dependent Claim 8. Claim 9 is allowable for at least the same reasons as dependent Claim 8 and independent Claim 1, and further because it adds the additional feature and limitation "wherein the wireless communication link is selected from a group of communication links consisting of: an infra-red communication link, a radio frequency communication link, a microwave communication link, a laser communication link, and combinations thereof". Applicant acknowledges the Examiner's statement that Ee and Smith do not teach that the communication link is a wireless communication link or an infrared, a radio, a microwave, or a laser type. Applicant submits that embodiments of Applicant's invention may not have the same bandwidth requirement as either Ee or Smith as embodiments of Applicant's invention merely communicate the URL using a simple protocol because "it only needs to handle sending a few bytes of data" (See specification at page 11, lines 2-3). Applicant therefore submits that not withstanding the Examiner's suggestion, it would not be obvious to use certain types of communications links as the small amount of information in the URL permit the use of slower communications links and simpler communication protocols, but do not require slow or simple ones. For at least these reasons, Applicants submit that dependent Claim 9 is distinguished from and allowable over the disclosure of Ee and Smith.

Claim 10 is dependent on independent Claim 1. Claim 10 is allowable for at least the same reasons as independent Claim 1, and further because the dependent claim adds the additional feature and limitation "wherein the web access module communicates with the

remote web server via the Internet communication link using an open standard communication protocol."

Claim 11 is dependent on dependent Claim 10 and is allowable for at least the same reasons as dependent Claim 10, and further because it adds the additional feature and limitation "wherein the open standard communication protocol is a Hyper Text Transport Protocol (HTTP)". The Examiner suggests that Ee teaches using an open standard communication protocol such as HTTP at col. 2, lines 54-61. Applicant only sees a reference to HTML pages and not to Hyper Text Transport Protocol (HTTP) as claimed. For at least these reasons, Applicants submit that dependent Claims 10-11 are distinguished from and allowable over the disclosure of Ee and Smith.

Claim 12 is dependent on independent Claim 1. Claim 12 is allowable for at least the same reasons as independent Claim 1, and further because the dependent claim adds the additional feature and limitation "wherein the render system further comprises at least one render system selected from a group of systems consisting of: a printer system, a display system, a projection display system, a user interface display system, an audio/video player system, a Web television system, and a combination thereof". Neither Ee nor Smith show such render system of the type or interoperability with the handheld device as claimed. Applicant submits that the claimed invention as a whole must be considered in determining patentability as well as on an element by element basis. For at least these reasons, Applicants submit that dependent Claim 12 is distinguished from and allowable over the disclosure of Ee and Smith.

Independent Claim 13

Claim 13 is an independent claim. Claim 13 preamble has been amended to provide "A system for providing an Internet-related service from a remote Internet-related server via an Internet communication link based on a Universal Resource Locator (URL) indicated by a handheld device". Claim 13 has been amended to recite "a receiver module to receive the URL from the handheld device via a communication link; a web access module to access and retrieve the Internet-related service via the Internet communication link based on the URL; a render module to render the retrieved Internet-related service, wherein the receiver module, the web access module, and the render module all are physically separated from the handheld device". Applicants respectfully submit that the cited art fails to disclose or suggest at least these features and that Claim 13 as amended is patentably distinct from the cited prior art.

Claim 13 recites "a receiver module to receive the URL from the handheld device via the communication link". In contrast, Ee discloses a handheld device including a display and an Internet browser for retrieving and navigating web pages from the Internet. (Ee, col. 2 lines 21-26). Applicants submit that Ee does not disclose or suggest a receiver module to receive the URL from the handheld device via the communication link.

Claim 13 further recites "a web access module to access and retrieve the Internet-related service via the Internet communication link based on the URL". In contrast, Ee discloses that a memory of the handheld device may store the browser, and that a user may retrieve a web page via modem to display the page on the necessarily small LCD of the handheld. (Ee, col. 2 lines 53-54, Ee, col. 3 line 66 to col. 4 line 5). Ee further discloses a wireless modem as part of the handheld device. (Ee, col. 3 lines 65-66, col. 4 lines 4-5.) Applicants respectfully submit that Ee does not disclose or suggest a web access module to

access and retrieve the Internet-related service via the Internet communication link based on the URL.

Additionally, Claim 13 recites "a render module to render the retrieved Internet-related service, wherein the receiver module, the web access module, and the render module are all physically separated from the handheld device". In contrast, Ee discloses a handheld device including a display and an Internet browser for retrieving and navigating web pages from the Internet. (Ee, col. 2 lines 21-26). Applicants submit that Ee does not disclose or suggest a render module independent of the handheld device. In contrast, Ee requires that the page is displayed on the LCD of the handheld device (Ee, col. 4, lines 4-6). Ee requires the display and the Internet browser is physically part of the handheld device. Applicants further submit that Ee does not disclose or suggest a render module to render the retrieved Internet-related service, wherein the receiver module, the web access module, and the render module are all physically separated from the handheld device.

Smith requires a wireless modem receives the data and determine the data type and then route the data according to the data type. (Note. Smith Abstract.) Claim 13 recites "a receiver module to receive the URL from the handheld device via a communication link". In contrast, Smith discloses a wireless modem coupled to at least one external device, and requires routing all data in accordance with the routing information for the data type. (Smith, col. 3 lines 34-35, Note. Smith Abstract.) Applicants submit that Smith fails to disclose or suggest a receiver module and/or the render module as recited in Claim 13.

The Examiner suggests that it would have been obvious to a person of ordinary skill in the art at the time the present invention was made to combine the teachings of Ee and Smith and add or replace the built-in wireless modem in Ee's handheld device with Smith's wireless modem where Smith's wireless modem can be connected to different handheld

devices. Applicants respectfully disagrees. In contrast to the Examiner's argument, Claim 13 provides that the client module sends the URL and the receiver module receives the URL via the communication link, accesses and retrieves the Internet-related service based on the URL, and renders the retrieved Internet-related service. Applicants submit that Ee/Smith do not provide this functionality. Further, Applicants submit there is no motivation for combining Ee and Smith.

Applicants submit that the cited art fails to disclose or suggest a handheld device indicating a URL as recited by Claim 13. Ee requires the handheld device to communicate over an Internet communication link. (Note Ee Abstract, col. 3 lines 65-66.) Additionally, Smith requires the handheld device to communicate over an Internet communication link. (Note Smith Abstract.) Applicants submit that Ee and Smith do not disclose or suggest the claimed limitation recited in Claim 13. For at least these reasons, Applicants submit that independent Claim 13 is distinguished from and allowable over the disclosure of Ee and Smith.

Dependent Claims 14-18

Claim 14 is dependent on independent Claim 13. Claim 14 is allowable for at least the same reasons as independent Claim 13, and further because the dependent claim adds additional features and limitations. Claim 14 further recites "wherein the render module further comprises at least one render system selected from a group of systems consisting of: a printer system, a display system, an information appliance, a projection display system, a user interface display system, an audio/video player system, a Web television system, and a

combination thereof". For at least these reasons, Applicants submit that dependent Claim 14 is distinguished from and allowable over the disclosure of Ee and Smith.

Claim 15 is dependent on independent Claim 13. Claim 15 is allowable for at least the same reasons as independent Claim 13, and further because the dependent claim adds additional features and limitations. Claim 15 further recites "wherein the web access module communicates with the remote Internet-related server via the Internet communication link using an open standard communication protocol". For at least these reasons, Applicants submit that dependent Claim 15 is distinguished from and allowable over the disclosure of Ee and Smith.

Claim 16 is dependent on dependent Claim 15. Claim 16 is allowable for at least the same reasons as dependent Claim 15 and independent Claim 13, and further because the dependent claim adds additional features and limitations. Claim 16 further recites "wherein the open standard communication protocol is a Hyper Text Transport Protocol (HTTP)". For at least these reasons, Applicants submit that dependent Claim 16 is distinguished from and allowable over the disclosure of Ee and Smith.

Claim 17 is dependent on independent Claim 13. Claim 17 is allowable for at least the same reasons as independent Claim 13, and further because the dependent claim adds additional features and limitations. Claim 17 further recites "wherein the communication link is a wireless communication link". For at least these reasons, Applicants submit that dependent Claim 17 is distinguished from and allowable over the disclosure of Ee and Smith.

Claim 18 is dependent on dependent Claim 17. Claim 18 is allowable for at least the same reasons as dependent Claim 17 and independent Claim 13, and further because the dependent claim adds additional features and limitations. Claim 18 further recites "wherein

the wireless communication link is selected from a group of communication links consisting of: an infra-red communication link, a radio frequency communication link, a microwave communication link, a laser communication link, and combinations thereof". For at least these reasons, Applicants submit that dependent Claim 18 is distinguished from and allowable over the disclosure of Ee and Smith.

New Claims 19-35

Applicant has added new claims 19-35 directed to other alternative embodiments of the invention to round out the protection to which the applicant is entitled. Although each of the added claim is different, and should separately be examined on an overall claim basis and on an element by element basis, each of the claims recites an element or an element using alternative language that has been distinguished from the cited art to Ee and Smith. Applicant has therefore chosen not to repeat such lengthy remarks again for the new claims.

Further Remarks

Applicants submit that the Claims as amended are supported by the application as filed and do not add new matter. Applicants respectfully request that the Examiner precisely identify teachings or suggestions in the prior art that would preclude patentability of the pending claims in the event that the Examiner is not in a position to allow the claims now pending.

Attached hereto is a marked-up version of the changes made to the specification and claims by the current amendment. The attached page is captioned "**VERSION WITH**

MARKINGS TO SHOW CHANGES MADE". Attached hereto is a clean version of the claims by the current amendment. The attached page is captioned "**PENDING CLAIMS**".

For the reasons given above, Applicants respectfully submit that the claims, as amended, are now in a condition for allowance, and allowance at an early date would be appreciated. Should the Examiner have any questions or comments, he is encouraged to call the undersigned at (415) 781-1989 to discuss the same so that any outstanding issues can be expeditiously resolved.

The Commissioner is authorized to debit any fees associated with this Communication to Deposit Account 50-2319 (Order No. A-72069/RMA/KRG) that have not otherwise been paid, including fees for any added claims or fees for Petition for Extension of time that may be required.

Respectfully submitted,

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Attachment:

VERSION WITH MARKINGS TO SHOW CHANGES MADE

In the Claims

1. (Amended) A system for providing Internet-related services in response to a handheld device without requiring the handheld device to itself be Internet-enabled, comprising:

a client module embedded in the handheld device to enable the handheld device to send a selected stored Universal Resource Locator (URL) via a local communication link, wherein the URL indicates a desired Internet web page;

a receiver that receives the URL sent from the handheld device via the local communication link;

a web access module coupled to the receiver and to an external Internet via an Internet communication link different from said local communication link to access and retrieve the desired web page from a remote web server via the external Internet; and

a render system coupled to the web access module to render the retrieved web page to the user of the handheld device.

2. (Unchanged) The system of claim 1, wherein the handheld device fits into a user's palm.

3. (Amended) The system of claim 1, further comprising a memory [in] coupled with the handheld device [that stores the] to store at least one URL, wherein the URL sent is selected from the at least one URL.

4. (Amended) The system of claim 1, further comprising a communication module in the handheld device that receives the URL from a remote site via [an external network] a second communication link coupled to the communication module.

5. (Amended) The system of claim 4, wherein the [external network] second communication link is a link to a wireless network.

6. (Amended) The system of claim 1, wherein the handheld device [can be] is selected from a group [comprising] of devices consisting of: a pager device, a cellular phone device, a personal organizer device, a watch device, a palm pilot device, and an information appliance device.

7. (Amended) The system of claim 1, wherein the receiver, the web access module, and the render system all physically reside within a single enclosure separate from the handheld device.

8. (Unchanged) The system of claim 1, wherein the communication link is a wireless communication link.

9. (Amended) The system of claim 8, wherein the wireless communication link is [one of] selected from a group of communication links consisting of: an infra-red communication link, a radio frequency communication link, a microwave communication link, [and] a laser communication link, and combinations thereof.

10. (Amended) The system of claim 1, wherein the web access module communicates with the remote web server via the Internet communication link using an open standard communication protocol.

11. (Unchanged) The system of claim 10, wherein the open standard communication protocol is a Hyper Text Transport Protocol (HTTP).

12. (Amended) The system of claim 1, wherein the render system [is one of] further comprises at least one render system selected from a group of systems consisting of: a printer system, a display system, a projection display system, a user interface display system, an audio/video player system, a Web television system, and a combination thereof.

13. (Amended) A system for providing an Internet-related service[s to] from a remote Internet-related server via an Internet communication link based on a Universal Resource Locator (URL) indicated by a handheld device, comprising:

a receiver [that receives] module to receive the URL [a Universal Resource Locator (URL)] from the handheld device via a communication link[, wherein the URL indicates a desired web page];

a web access module [coupled to the receiver and external Internet to access and retrieve the desired web page from a remote web server via the external Internet] to access

and retrieve the Internet-related service via the Internet communication link based on the URL;

a render [system coupled to the web access module to render the retrieved web page to the user of the handheld device] module to render the retrieved Internet-related service, wherein the receiver module, the web access module, and the render [system] module are all physically separated from [reside within the system while] the handheld device [is physically separated from the system].

14. (Amended) The system of claim 13, wherein the render [system is one of] module further comprises at least one render system selected from a group of systems consisting of: a printer system, a display system, an information appliance, a projection display system, a user interface display system, an audio/video player system, a Web television system, and a combination thereof.

15. (Amended) The system of claim 13, wherein the web access module communicates with the remote [web] Internet-related server via the Internet communication link using an open standard communication protocol.

16. (Unchanged) The system of claim 15, wherein the open standard communication protocol is a Hyper Text Transport Protocol (HTTP).

17. (Unchanged) The system of claim 13, wherein the communication link is a wireless communication link.

18. (Amended) The system of claim 17, wherein the wireless communication link is [one of] selected from a group of communication links consisting of: an infra-red communication link, a radio frequency communication link, a microwave communication link, [and] a laser communication link, and combinations thereof.

19. (New) The system of Claim 1, wherein the web access module comprises a web browser without a rendering function.

20. (New) The system of Claim 1, wherein the rendering system is a device-specific rendering system.

21. (New) The system of Claim 1, wherein the handheld device is a watch.

22. (New) The system of Claim 1, wherein the handheld device is a pager.

23. (New) The system of Claim 1, wherein said client module is does not have Internet access function and does not include an Internet web browser application program or provide any direct connectivity to the Internet.

24. (New) The system of Claim 1, wherein said client module has Internet access function and includes an Internet web browser, but neither the Internet access function nor the Internet web browser are utilized to send the URL via the local communication link.

25. (New) The system of Claim 1, wherein only said URL is communicated, and said URL is communicated by sending only a few bytes of data.

26. (New) The system of Claim 1, wherein the URL is in the actual URL form or embedded in a hyperlink.

27. (New) The system of Claim 1, wherein the rendering system includes a printer external to said handheld device or a display screen device external to said handheld device.

28. (New) The system of Claim 1, wherein the rendering system includes an audio or video player system external to said handheld device.

29. (New) A mobile system capable of communicating with a gateway module, which comprises a web access module to access and retrieve an Internet-related service from a remote Internet-related server via an Internet communication link based on a Universal Resource Locator (URL); and a render module to render the received Internet-related service, the mobile system comprising:

a client module to enable sending the URL via a communication link to the gateway module for use in the access and retrieval of the Internet-related service, wherein the gateway module communicates the retrieved Internet-related service with the rendering module, which renders of the retrieved Internet-related service in proximity to the mobile system.

30. (New) The system of claim 29, further comprising a memory coupled with the mobile system to store at least one URL, wherein the URL sent is selected from the at least one URL.

31. (New) The system of claim 30, further comprising a communication module to receive the URL from the gateway module.

32. (New) A gateway system capable of receiving a communication including Universal Resource Locator (URL) via a communication link from a mobile system, said gateway system comprising:

a communication module to receive the communication from the mobile system;

a web access module to access and retrieve an Internet-related service from a remote Internet-related server via an Internet communication link based on the URL; and

a render module to receive the retrieved Internet-related service from the web access module and to render at least a subset of the retrieved Internet-related service in proximity to the mobile system.

33. (New) The system of claim 32, further comprising a second communication module to send a second URL to the mobile system.

34. (New) The system of claim 33, wherein each module of the gateway system physically resides within at least one enclosure separate from the mobile system.

35. (New) A system for providing Internet-related services in response to a handheld device without requiring the handheld device to itself be Internet-enabled, comprising:

a receiver that receives a Universal Resource Locator (URL) sent from the handheld device via a local communication link, wherein the URL indicates a desired Internet web page;

a web access module coupled to the receiver and to an external Internet via an Internet communication link different from said local communication link to access and retrieve the desired web page from a remote web server via the external Internet; and

a render system coupled to the web access module to render the retrieved web page to the user of the handheld device, wherein the receiver, the web access module, and the render

system all physically reside within the system while the handheld device is physically separated from the system, and

wherein the render system further comprises at least one of: a printer system, a projection display system, an audio/video player system, and a Web television system.